



March 1, 2018

FOIA Officer
Office of Information Resources
Mailstop MA-90, Room 1G-051
1000 Independence Ave, SW
Washington, DC 20585

**Request for 1) Non-Proliferation Impact Assessment on German AVR, THTR Spent Fuel &
2) Non-Proliferation Impact Assessment on Technology at SRS to Process Such Spent Fuel**

To Whom it Concerns:

This is a request filed under the Freedom of Information Act, as amended. Per the applicable law and Department of Energy regulations, I anticipate a response to this request within 20 days.

This request is being filed on behalf of Savannah River Site Watch (SRS Watch), a corporation duly registered with the State of South Carolina and an IRS-certified 501(c)(3) non-profit organization.

While now working for SRS Watch, I have filed many FOIA requests with DOE on behalf of other non-profit organizations, including Friends of the Earth, the Alliance for Nuclear Accountability, Greenpeace and the Nuclear Control Institute and have never been charged a fee for any FOIA request.

I request that any fees that may be associated with this request be waived. The information obtained due to this request will be used solely for non-profit purposes in South Carolina and the United States. The information will contribute to the public's understanding of the manner in which DOE and NNSA conducts their business and will specifically be used to inform the public about DOE's project aimed at importing, processing and disposing of highly radioactive spent nuclear fuel from Germany. The information obtained via this request will be provided to not only the public but also to the media and the Savannah River Site Citizens Advisory Board (a duly embodied federal advisory panel). Over the years, I have demonstrated an ability to use information gathered via FOIA requests in a manner so as to educate the public about DOE and NNSA and issues it is addressing. I request that the fee-waiver standard that has been applied to my requests in the past be applied to this request.

If any claim is made that any portion of any located documents are sensitive in nature or meet FOIA exclusions, I request that redacted copies of such documents be provided to me and that a full explanation be provided as to the reasons for any redactions. I request that documents be provided to me as they become available to staff and that the documents not be withheld until all pertinent documents are obtained.



This request applies to the DOE and National Nuclear Security Administration in Washington, the Savannah River Site offices of Environmental Management AND NNSA, Savannah River National Laboratory and any of their contractors.

I have attached an August 1, 2013 memo from NNSA entitled "Proliferation Attractiveness of Jülich Graphite Spheres." This request is, in part, for any update to that memo or any other memo or document or emails concerning proliferation matters regarding management of the AVR or THTR German graphite spent fuel either in Germany or the United States.

I hereby request the following documents:

- 1. Any documents or analyses of the proliferation risks of management of spent fuel from the long-closed German AVR and THTR gas-cooled reactors that have been prepared since August 1, 2013. Such document(s), including memos and emails, may be called such things as a "non-proliferation impact assessment" or could be a memo on "proliferation attractiveness" of the material.**
- 2. All cover letters and attachments to the above documents.**
- 3. Any type of (non-)proliferation assessment(s) of the techniques being developed at the Savannah River Site to digest graphite spent fuel from the AVR and THTR gas-cooled reactors. And, cover letters or attachments to the requested item(s).**

Thank you for processing this request in the time period mandated by law and regulation. If you have any questions about this request, please contact me at telephone 803-834-3084 or email tomclements329@cs.com.

Sincerely,



Tom Clements
Director, Savannah River Site Watch (SRS Watch)
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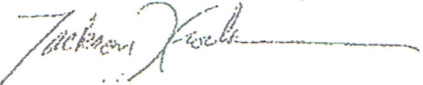
Department of Energy
National Nuclear Security Administration
Washington, DC 20585



August 1, 2013

MEMORANDUM FOR KENNETH PICHA
DEPUTY ASSISTANT SECRETARY
OFFICE OF TANK WASTE AND NUCLEAR MATERIAL

ARTHUR G. ATKINS
ACTING ASSISTANT DEPUTY ADMINISTRATOR
OFFICE OF GLOBAL THREAT REDUCTION

FROM: JACKSON Q. CROCKER 
DIRECTOR
OFFICE OF NUCLEAR THREAT SCIENCE

SUBJECT: Proliferation Attractiveness of Jülich Graphite Spheres

We have completed a technical evaluation of the High Temperature Gas-Cooled Reactor graphite fuel assemblies currently stored at Forschungszentrum Jülich (GmbH) to assess its material attractiveness. The graphite spheres each weigh approximately 200 g. The concentration of uranium (^{233}U) is 0.5% by weight, as dioxide. Thorium dioxide is also present at 5% by weight along with a small amount of SiC (2.3 g). We assess the material as low attractiveness (Attractiveness level "E"), which only requires Category IV security protection. We also assess the material is not attractive to sub-state/terrorist entities in its current state. Since the material is stored in a secure environment in a politically stable country, it is not of a proliferation concern.

However, because the material is of U.S. -origin, the NNSA believes that the Department does have an unofficial responsibility to assure the material is adequately dispositioned. Therefore, NNSA supports "Work for Other" activities by DOE's Office of Environmental Management to help Germany develop and implement an appropriate disposition pathway for this material. Although not a nonproliferation activity, it does serve to minimize the amount of U.S. HEU at civilian facilities worldwide.

cc: Jay Tilden, NA-80
Deleon Edgardo, EM-22

OFFICIAL USE ONLY
May be exempt from public release under the Freedom of Information Act (5 USC 552); Exemption 7, Law Enforcement.
Department of Energy review required before public release.
Name/Orig: J.Q. Crocker, NA-82 Date: 07/31/13

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